

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WARNER BROS. ENTERTAINMENT INC.;  
TWENTIETH CENTURY FOX FILM  
CORPORATION; COLUMBIA PICTURES  
INDUSTRIES, INC.; UNIVERSAL CITY STUDIOS  
LLC; UNIVERSAL STUDIOS HOME  
ENTERTAINMENT LLC; DISNEY ENTERPRISES,  
INC.; PARAMOUNT PICTURES CORPORATION;  
and VIACOM INTERNATIONAL, INC.,

*Plaintiffs,*

v.

PHAT BUI and DOES 1-10, D/B/A PUBFILM.COM,  
PUBFILMNO1.COM, PUBFILMHD.COM,  
PIDTV.COM, TOP100FILM.COM, and  
IDMCA.NET,

*Defendants.*

CIV. A. NO. 17-CV-875 (VM)

**REQUEST FOR ENTRY OF  
DEFAULT**

To: RUBY J. KRAJICK, Clerk of Court  
United States District Court  
Southern District of New York

Plaintiffs Warner Bros. Entertainment Inc.; Twentieth Century Fox Film Corporation; Columbia Pictures Industries, Inc.; Universal City Studios LLC; Universal Studios Home Entertainment LLC; Disney Enterprises, Inc.; Paramount Pictures Corporation; and Viacom International, Inc. (collectively, "Plaintiffs") respectfully request entry of default pursuant to Fed. R. Civ. P. 55(a) against Defendants Phat Bui and Does 1-10, d/b/a/ PubFilm.com, PubFilmNo1.com, PubFilmHD.com, PidTV.com, Top100film.com, and iDMCA.net (collectively, "Defendants") for their failure to appear or otherwise respond to the Complaint within the time specified by the Federal Rules.

I hereby certify, as stated in the Affirmation of Kenneth L. Doroshow in Support of Plaintiffs' Request for Entry of Default, filed herewith, that this action was commenced on February 6, 2017 with the filing of a Summons and Complaint. Defendants were served with the Summons and Complaint by email on February 15, 2017, as authorized by the Court. On February 22, 2017, proof of service of the Summons and Complaint was filed with the Court.

I further certify that, as indicated by the docket entries, the Defendants have not filed an answer or otherwise moved with respect to the Complaint. More than 21 days have elapsed since service was performed, and the Defendants have not been granted any extension of time to respond to the Complaint – indeed, Defendants are in default by more than nine (9) months. The Defendants have failed to answer or otherwise respond to the Complaint, or serve any answer or other response on Plaintiffs' attorneys of record.

A proposed Certificate of Default is being submitted for the Court's convenience as Exhibit A hereto.

Dated: Washington, D.C.  
December 20, 2017

Respectfully submitted,

JENNER & BLOCK LLP

By: \_\_\_\_\_ s / Kenneth L. Doroshow \_\_\_\_\_

Kenneth L. Doroshow (KD-8374)  
1099 New York Ave., N.W.  
Suite 900  
Washington, DC 20001  
Telephone: (202) 639-6027  
Facsimile: (202) 661-4855

Lori B. Day (LD-1197)  
919 Third Avenue  
37th Floor  
New York, NY 10022  
Telephone: (212) 407-1772  
Facsimile: (212) 891-1699

MOTION PICTURE ASSOCIATION OF  
AMERICA, INC.

Karen R. Thorland (*Pro Hac Vice*)

karen\_thorland@mpaa.org

15301 Ventura Blvd.

Building E

Sherman Oaks, CA 91403

Telephone: (818) 935-5812

*Attorneys for Plaintiffs*